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Counsel to Bruce H. Matson, Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:)	
)	Chapter 11
)	
RICHMOND CHRISTIAN CENTER,)	Case No. 13-36312
)	
Debtor.)	
)	

SUMMARY OF BALLOTS

Bruce H. Matson, Chapter 11 Trustee (the “**Trustee**”) for Richmond Christian Center (the “**Debtor**”), by counsel and pursuant to Local Rule 3016-1, submits the following Summary of Ballots with respect to the Trustee’s Amended Chapter 11 Plan of Reorganization dated July 13, 2015 [Docket No. 318] (the “**Plan**”), and respectfully states as follows:

I. BACKGROUND

1. On November 22, 2013 (the “**Petition Date**”), the Debtor commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code [Docket No. 1].

2. The Debtor has continued in possession of its property and has continued to operate and manage its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. The Trustee was appointed by Order dated January 6, 2015 [Docket No. 203], and continues to serve in that capacity.

4. On July 13, 2015, the Trustee filed his Amended Disclosure Statement for Chapter 11 Plan of Reorganization [Docket No. 319] (the “**Disclosure Statement**”) and the Plan.

5. On July 14, 2015, the Trustee filed his Motion for Order (I) Conditionally Approving Disclosure Statement, (II) Scheduling Hearing and Objection Deadline on Final Approval of Disclosure Statement, (III) Scheduling Hearing and Objection Deadline on Plan Confirmation, (IV) Approving the Form of Ballots, Voting Deadline and Solicitation Procedures, and (V) Approving Form and Manner of Notice [Docket No. 320].

6. By Order dated July 16, 2015 [Docket No. 322], the Court conditionally approved the Disclosure Statement (the “**Disclosure Statement Order**”).

7. On August 5, 2015, counsel for the Trustee mailed his Notice of Entry of Order (I) Conditionally Approving Disclosure Statement, (II) Scheduling Hearing and Objection Deadline on Final Approval of Disclosure Statement, (III) Scheduling Hearing and Objection Deadline on Plan Confirmation, (IV) Approving the Form of Ballots, Voting Deadline and Solicitation Procedures, and (V) Approving Form and Manner of Notice (the “**Notice**”) to everyone required to receive notice pursuant to Rules 2002 and 3017 of the Federal Rules of Bankruptcy Procedure. Included with the notice were:

- a. A copy of the Plan;
- b. A copy of the Disclosure Statement as approved by the Court;
- c. A copy of the Disclosure Statement Order; and
- d. Ballots.

8. On August 28, 2015, the Internal Revenue Service (the “**IRS**”) filed its Objection to Confirmation of the Plan [Docket No. 342] (the “**IRS Objection**”).

9. On September 2, 2015, Motley’s Auctions, Inc. (“Motley’s”) filed its Objection to Confirmation of the Plan [Docket No. 345] (the “**Motley’s Objection**”).

II. SUMMARY OF BALLOTS

10. Class One under the Plan consists of the priority (non-tax) claims of which there were none.

11. Class Two under the Plan consists of the secured claim of Foundation Capital Resources, Inc. (“**FCR**”). Counsel for the Trustee received a Class Two ballot from FCR accepting the Plan. As such, 100% of the creditors in Class Two, representing 100% of the amount of claims in Class Two, have accepted the Plan.

12. Class Three under the Plan consists of the non-voting status parties.

13. Class Four under the Plan consists of the general unsecured claims. Counsel for the Trustee received Class Four Ballots from Comtel and Harrell & Chambliss LLP accepting the Plan. As such, 100% of the creditors voting in Class Four, representing 100% of the amount of claims voting in Class Four have accepted the Plan.

Dated: December 17, 2015

BRUCE H. MATSON, CHAPTER 11
TRUSTEE

/s/ Christopher L. Perkins
Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of December, 2015, a true and correct copy of the foregoing was filed with the Court through the Court's CM/ECF filing system and served on all parties receiving electronic notification, including the office of the United States Trustee and counsel for the Debtor.

/s/ Christopher L. Perkins
Counsel